Dennis M. Reznick (DR4841) EDWARDS ANGELL PALMER & DODGE LLP 51 John F. Kennedy Parkway Short Hills, NJ 07078 (973) 376-7700

Of Counsel:
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Attorney for Defendants RC2 Corporation, Learning Curve Brands, Inc., and Toys "R" Us, Inc.

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

DAVID MURDOCK, Individually and as Father and Next Friend of BEAU FARISH MURDOCK and ANABELLE SAGE MURDOCK miner children, on behalf of	) ) ) Civil Action No. 2:07-CV-03376 (WHW-MF)
MURDOCK, minor children, on behalf of all others similarly situated,	CIVII ACUOII NO. 2:07-CV-03370 (WHW-MF)
Plaintiffs, )	SUPPLEMENTAL CERTIFICATION IN OPPOSITION TO PLAINTIFF'S MOTION
v. )	FOR APPOINTMENT OF INTERIM LEAD COUNSEL AND IN SUPPORT OF CROSS-
RC2 CORPORATION, LEARNING )	MOTION FOR STAY OF PROCEEDINGS
CURVE BRANDS, INC., LEARNING )	AND FOR EXTENSION OF TIME TO
CURVE BRANDS, INC. d/b/a RC2	ANSWER
BRANDS, INC., WAL-MART STORES, )	
INC. and TOYS "R" US, INC.,	
	[Document Electronically Filed]
Defendants.	

DENNIS M. REZNICK, being of full age, certifies:

1. I am an attorney at law of the State of New Jersey and a partner in the law firm Edwards Angell Palmer & Dodge LLP. Edwards Angell Palmer & Dodge has been retained as

Local New Jersey Counsel to represent the interests of the moving party defendants, RC2

Corporation, Learning Curve Brands, Inc. and Toys "R" Us, Inc. (collectively referred to as the

"Moving Defendants").

2. On behalf of the Moving Defendants, I am submitting this Supplemental

Certification which includes a true copy of Plaintiffs' Initial Response to Defendants' Motion to

Stay, which was filed in the matter <u>James Weldon Stratton and Christa Marie Stratton</u>, et al. v.

RC2 Corp., et al. pending in the United States District Court for the Eastern District of Arkansas,

Case No. 4-07-CV-00640. As is noted in the text of plaintiffs' response to defendants' motion for

stay in that case, plaintiffs had no objection to staying that action in deference to the proceedings

before the multi-district litigation panel, and further agreed that the most efficient adjudication of

the matters before that Arkansas court would be accomplished by consolidation of all pending

Thomas & Friends™ Wooden Railways toys actions in the Northern District of Illinois.

3. Our firm did not become aware of this pleading, which was filed on September

10, 2007 until after we had filed our Cross-Motion and opposition in this matter and are

therefore, supplementing that filing herewith.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on: September 12, 2007

## **CERTIFICATION OF SERVICE**

I hereby certify that on September 12, 2007, a true copy of the within Supplemental Certification of Dennis M. Reznick, Esq. in Opposition to Plaintiff's Motion for Appointment of Interim Lead Counsel and in Support of Cross-Motion for Extension of Time to Answer and For Stay of Proceedings, with exhibits annexed, was served pursuant to the Federal Rules of Civil Procedure, and/or the District of New Jersey's Local Rules and/or the District of New Jersey's ECF Policies and Procedures and by sending same via first class mail service offered by the U.S. Postal Service, in postage paid envelopes addressed to the following counsel for the parties at the addresses indicated:

Peter S. Pearlman, Esq. COHN LIFLAND PEARLMAN HERRMANN & KNOPF LLP Park 80 Plaza West-One Saddle Brook, NJ 07663

Attorneys for Plaintiffs

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Executed on: September 12, 2007

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205582

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Document 21

Filed 09/10/2007

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SEP 10 2007

UNITED STATES DISTRICT COURT, AMES W. McCORMACI EASTERN DISTRICT OF ARKANSA

James Weldon Stratton and Christa Marie Stratton, et.al.

PLAINTIFFS

VS.

U S District Court Case 4-07-CV-00640 JMM

RC2 Corp., Racing Champions ERTL Corp., and Learning Curve Brands, Inc., et.al.

DEFENDANTS

## PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO STAY

Comes now the plaintiffs, by and through their attorneys Streett Law Firm, P.A., and hereby respond to defendants' motion to stay in the above-styled matter.

Plaintiffs have no objection to staying the instant action in deference to the proceedings before the multi-district litigation panel. As it stands, an over-whelming majority of the cases involving lead-painted Thomas and Friends Wooden Railway Toys™ are pending before Federal Judge Harry D. Lienenweber in the Nnorthern District of Illinois. Upon information and belief, the cases in that district have been consolidated, competent and qualified lead counsel have been appointed to oversee the management of those cases, and a pre-trial order has been entered by the Court to oversee the timely progression of those cases. In light of the foregoing, Plaintiffs agree that the most efficient adjudication of the matters before this Court can and should be accomplished by consolidation of all pending Thomas and Friends Wooden Railway Toys™ actions in the Northern District of Illinois.

> STREETT LAW FIRM, P.A. James A. Streett, ABA #2007092

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Phone 479-968-2030

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## CERTIFICATE OF SERVICE

I hereby certify that I have forwarded by United States Mail, postage prepaid, a copy of the foregoing pleading to the parties listed below:

Gordon S. Rather, Jr. Wright, Lindsey & Jennings, LLP 200 West Capitol Ave., Suite 2300 Little Rock, AR 72201-3699

DATED this day of September, 2007.

James A. Streett Alex G. Streett